

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS

v.

CA. NO. 04-1350 (GMS)

DR. SYLVIA FOSTER, ET AL.

MOTION FOR DISCLOSURE FOR
DEFENDANT DR. SYLVIA FOSTER'S
RESPONSE TO PLAINTIFF'S MOTION
FOR ADMISSIONS # 1 FOR DR. FOSTER
PURSUANT TO FED R. CIV P# 37 + 8



DATE : 2/23/07

Jimmie Lewis
SBI # 506622
DEL. CORR. CENTER
1181 PADDICK RD
SMYRNA, DEL 19977

1.) THE DEFENDANT DR. SYLVIA FOSTER, IN RESPONSE TO THE PLAINTIFF'S MOTION FOR ADMISSIONS # 1, NOTE "OBJECTION" AS ANSWERS TO NUMBERS 1-2-3-4-6-7-8-9-10-11-12-14-15-16-17-18-19-21-22-23-24 AND 25, WHICH WERE FILED IN THE EXACT SAME MANNER, IN MOTION FORM, AS THE MOTIONS FOR INTERROGATORIES.

2.) THE PLAINTIFF VIEWS THE DEFENDANT'S ANSWERS, "OBJECTION", TO BE INSUFFICIENT AND EVASIVE AND HEREBY REQUEST THIS HONORABLE COURT TO ISSUE AN ORDER THAT WOULD REQUIRE THE DEFENDANT TO EITHER DENY SAID CLAIMS TO BE FALSE OR EITHER ADMIT SAID CLAIMS TO BE TRUE.

FOR THE FOREGOING REASONS, I HEREBY REQUEST FOR THIS MOTION FOR DISCLOSURE TO BE GRANTED.

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED PLAINTIFF JIMMIE LEWIS
DUE HEREBY CERTIFY ON THIS 23 RD, DAY OF FEB,
2007, THAT I DID MAIL ONE TRUE AND
CORRECT COPY OF THE MOTION FOR DISCLOSURE
FOR DEFENDANT DR. SYLVIA FOSTER'S RESPONSE
TO PLAINTIFF'S MOTION FOR ADMISSION'S #1
FOR DR FOSTER PURSUANT TO FED R CIV P 87
P #37 BY U.S POSTAL TO EACH OF
THE FOLLOWING :

CLERK OF THE COURT (GMS)
UNITED STATES DISTRICT COURT
844 N. KING ST, LOCKBOX 18
WILMINGTON, DEL 19801

LOUIS J. RIZZO JR ESG
1001 JEFFERSON PLAZA
SUITE 202
WILMINGTON, DEL 19801
ATTORNEY FOR DR. FOSTER

DATE: 2/23/07

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L.S.M.S.
X-RAY